UNITED STATES DISTRICT COURT

for the **Middle District of Tennessee** at Columbia

RECEIVED

AUG 28 2024

US DISTRICT COURT MID DIST TENN

Carlos Farris,

Plaintiff,

v.

Case No.: 1:23-CV-00024-WLC-BDH

David Baker, Adam Boron, F/N/U Kacy, Lt. F/N/U Harris, Lt. F/N/U Maddox, F/N/U Scott, Trinity Food Services,

Defendants.

THE PLAINTIFFS SET OF INTERROGATORIES AND REQUEST FOR THE PRODUCTION TO THE DEFENDANTS CHAPLIN DAVID BAKER, LT. F/N/U **BRANDON HARRIS, LT. F/N/U MADDOX**

- 1. Were you informed of Mr. Carlos M, Farris, religious beliefs and that he followed the procedure that was given to him by Lt. F/n/u Maddox and Lt. F/U/N Brandon Harris and the chaplain David Baker, which was that he, carlos farris must be a proved threw thye chaplin to receive a religious dietary tray?
- 2.Did Mr.Carlos M. Farris sent the request to chaplin David baker, and was he or was he not approved for a not me tray.
- 3.Did You Know of the problems and complaint that mr. carlos farris was receiving trays that he could not eat even after him being approved and that upon him telling the c.o's that he could not eat meat the c'os would ask for the tray back with the c.o's telling him they woulf fix it .but in truth would not fix it but let mr.carlos m. farris go hungry.
- 4.can you recall mr.carlos farris being told on more then one occasion that the kitchen was closed and there was nothing that the c.o's could do about it and he would go without eating.
- 5. were you or your co workers ever told that all inmates were to eat what was served regardless o religion and all religious trays were being cut out .and no one was to receive a religious tray even

if approved by the chaplain.

6.were the C.o's working on all shifts told to follow the policy that was stated all inmates were to receive two(2) hot meals And (1) Cold. And do you remember mr.carlos farris making complaints about him not getting a hot meal due to his religion.

7. Do you recall mr.carlos M.Farris being told that the patties that were being fed to the inmates were soy an some other plant food because of all the religious dietary trays. But they were really meat blend patties .and were fed to mr.carlos m farris .

8. How Was Mr. Carlos Farris the plaintiff behavior while in your custody. When it Came to his Religion? Was he a bad inmate or Helpful inmate towards your staff and towards other inmates.

Respectfully submitted,

Carlos M. Farris, #391233 2520 Union Springs Rd. Whiteville, TN 38075

Certificate of Service

I, Carlos Farris, swear under penalty of perjury, that a true and exact copy of the foregoing was placed inside the outgoing mailbox at Hardeman County Correctional Facility, to be logged and mailed, via U.S. Mail, with sufficient postage for First-Class, on this 13th day of August, 2024, to:

Robyn Beale Williams 12 Cadillac Drive Suite 480 Brentwood, TN 37027; and

Alexander B. Chosid 1260 Andes Boulevard St. Louis, MO 63132.

Carlos Farris

RECEIVED

AUG 28 2024

US DISTRICT COURT MID DIST TENN



I/M# 00391233 HCCF/Unit-L/Pod-D/Cell-106 2520 Union Springs Road Whiteville, TN 39075

> **Court Clerk United States District Court** Middle District of Tennessee

> > 719 Church Street Suite 1300 Nashville, TN 37203

LEGAL MAIL

1400mit - 1400mit -